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June 9, 2025

VIA ECF

The Honorable Lewis J. Liman Danial Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

Re: Lively v. Wayfarer Studios LLC, et al., Case No. 1:24-cv-10049-LJL; Jed Wallace's and Street Relations, Inc.'s Supplement to Motion for Stay Discovery Against Them Pending Resolution of Their Motions to Dismiss or, in the Alternative, Motion to Sever and to Transfer Venue, Dkt. 287 ("Motion")

Dear Judge Liman:

By this supplement we wish to advise the Court that immediately (within 24 hours) after our clients Defendants Jed Wallace ("Wallace") and Street Relations, Inc. ("Street") (collectively "Wallace Defendants") filed their letter motion for a stay of discovery (Dkt. 287), Plaintiff Blake Lively, ("Lively") gave notice that she was issuing a subpoena out of this Court pursuant to F.R.C.P. Rule 45 for the deposition of Street's corporate representative.

The corporate notice that accompanied the intent to issue a subpoena covered 20 wide-ranging and, we suggest, overbroad topics. (Exhibit A) We ask that the Court consider this additional discovery demand on the Wallace Defendants when deciding the request for a stay.

Thank you for your attention to this matter.

Respectfully submitted,

Charles F. Ball

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